Winnebago Reclamation Service, Inc.

December 20, 1993

Illinois Department of Public Health
535 W. Jefferson St.
Room 500
Springfield, IL 62761

Re: Public Health Assessment
Pagel's Pit Landfill
New Milford, Winnebago Co., IL
CERCLIS NO. ILD 980606685

Gentlemen:

I am writing to submit our comments on the Public Health Assessment for the Pagel's Pit Landfill. As a general comment, we note that a significant part of the report involves a discussion of sources or possible sources of groundwater contamination in the area. We agree with other IDPH reviewers that the source or sources of groundwater contamination in the vicinity of the site are not particularly relevant to the public health impacts of the contamination. Our specific comments are as follows:

SUMMARY, Page 3, paragraph 1. Although previous reports such as the RI/FS have referred to the WRL Site as a former sand and gravel pit, it is actually the site of a former limestone quarry.

BACKGROUND, Section A, Page 4, paragraph 1. (same comment as above)

BACKGROUND, Section A, page 4, paragraph 1. In 1992, a sanitary sewer line was installed which connects the WRL site to the Rock River Water Reclamation District, a local POTW. Since then, leachate has been piped to the District by sewer line.

BACKGROUND, Section A, page 4, paragraph 3. In addition to the landfill and the sludge drying operation, there are a number of other uses which may have contributed to odors in the area. These uses include: the alcohol manufacturing plant which operated from 1985 through 1986 on property adjoining the WRL, the hog feedlot located to the east of the WRL site, and the septic tank pumping and cleaning business located west of the WRL site.

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BACKGROUND, Section A, page 5, paragraph 5. The text states that contamination in the Southeast corner of the "landfill" will be addressed in the future when its source is identified. Actually, under the ROD, the area excluded from the first operable unit is described as the southeast corner of the "site," rather than the southeast corner of the "landfill." Additionally, the ROD provides that the contamination in the southeast corner will be addressed in the future "under a separate ROD," rather than "when its source is identified."

BACKGROUND, Section A, page 6, paragraph 1. WRL disputes many of the violations alleged in the inspection reports referred to in this paragraph. If the information in this paragraph is relevant to the health assessment, then it is also relevant that the landfill has been inspected on several occasions since the dates described in the text. In these subsequent inspections, the WRL has been found to be operating in compliance with state regulations and the terms of its permits.

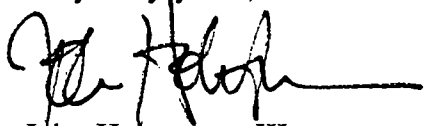
ENVIRONMENTAL CONTAMINATION AND OTHER HAZARDS, Section A (Groundwater), page 11, paragraph 3. The text notes that several metals were detected in wells throughout the area and that "this is consistent with the elevated levels of metals and inorganic compounds detected in the leachate." The report, however, does not say whether the detections of organics found in the groundwater in the area are consistent with the levels of organics found in the leachate. The RI concluded that concentrations of organics detected in the groundwater were not consistent with the levels of organics detected in the leachate (RI report, p. 4-28).

ENVIRONMENTAL CONTAMINATION AND OTHER HAZARDS, Section A (Groundwater), page 11, paragraph 3. Note that the use of chlorides as an indicator parameter and the determination of background chloride levels is further complicated by the use of road salts, dust suppressants, and residential water softeners east of the landfill.

ENVIRONMENTAL CONTAMINATION AND OTHER HAZARDS, Section B (Private Wells), page 15, paragraph 4. The text states that USEPA intends to install a groundwater extraction system. Actually, under the ROD and the Consent Decree entered in February 1992, the owner/operator of the WRL is required to install the groundwater extraction system. The pre-design studies for that system are currently underway. Additionally, the Acme Solvents PRPs are required to install a similar groundwater extraction system immediately east of the WRL. The Acme solvents groundwater extraction system is expected to be installed in 1994.

Thank you for the opportunity to submit comments on the Assessment. If you have any questions, please do not hesitate to call me.

Very truly yours,



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